



April 5, 2021

Mr. Austin F. Callwood, Director  
Division of Environmental Protection  
Department of Planning & Natural Resources  
45 Mars Hill  
Frederiksted, V.I. 00840-4474

**SUBJECT: No. 8 Flare H<sub>2</sub>S Exceedance – March 29, 2021 to March 30, 2021**

Dear Mr. Callwood:

This letter is submitted in compliance with Condition No. 2.4.5.1 of Limetree Bay Title V permit as a follow-up to the email notifications to Ms. Verline Marcellin of the Division of Environmental Protection on Monday, March 29, 2021 at 11:29 PM regarding the H<sub>2</sub>S exceedances at the No. 8 Flare.

The Continuous Emissions Monitoring System (CEMS) recorded H<sub>2</sub>S concentrations in the No. 8 Flare in excess of 0.1 gr/dscf (162 ppm) based on a 3-hr rolling average (ref. Title V permit condition 3.2.5.5 & 3.2.5.6) from March 29<sup>th</sup> to 30<sup>th</sup>, 2021.

The following table provides 3-hr H<sub>2</sub>S concentrations at the No. 8 Flare during the exceedance events.

Source	Parameter	Unit	FLARE08 H2SPPMD (PPM)
03/29/21	20:00		79.5
03/29/21	21:00		122.0
03/29/21	22:00		180.5
03/29/21	23:00		182.8
03/30/21	00:00		213.4
03/30/21	01:00		228.5
03/30/21	02:00		284.0

Source	Parameter	Unit	FLARE08 H2SPPMD (PPM)
03/30/21	03:00		259.4
03/30/21	04:00		233.4
03/30/21	05:00		232.3
03/30/21	06:00		241.3
03/30/21	07:00		226.3
03/30/21	08:00		178.5
03/30/21	09:00		151.2

Source	Parameter	Unit	FLARE08 H2SPPMD (PPM)
03/30/21	10:00		166.7
03/30/21	11:00		166.7
03/30/21	12:00		166.7
03/30/21	13:00		166.7
03/30/21	14:00		151.6
03/30/21	15:00		146.7
03/30/21	16:00		132.7

On March 29, 2021, in an attempt to reduce the H<sub>2</sub>S levels in the fuel gas, Operations shut down the compressors at the No. 2 Gas Recovery Unit (2GRU) in order to stop recycling high H<sub>2</sub>S fuel gas. Next, Operations introduced clean fuel gas to 2GRU to purge any residual high H<sub>2</sub>S fuel gas in the system which vented to the No. 8 Flare. While 2GRU was purging, the fuel gas balance drums had high liquid levels which Operations drained to the No. 8 Flare as well. Both situations caused the high levels of H<sub>2</sub>S at the No. 8 Flare. Subsequently, in an effort to address the overall H<sub>2</sub>S issues at the facility, Operations decided to place process units offline or on circulation while maintenance is performed on the No. 4 and No.5 Amine Regeneration Units (ARU). Upon opening the tower in No. 4 ARU, the seal pan that provides flow to the reboilers and allows amine to be regenerated in order to scrub H<sub>2</sub>S, was found dislodged and at the bottom of the tower. No. 5 ARU will also be opened and repairs made as necessary.

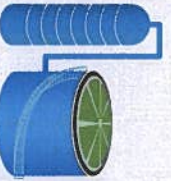
If you have any questions or need additional information, please contact Maria Aloyo at (340) 692-3781.

Sincerely,

*MA Aloyo / For R. WELDZIUS*

Robert Weldzius  
Senior Vice President, Refining  
Limetree Bay Refining, LLC

Electronic copy: Verline Marcellin (DPNR)



**LIMETREE BAY**  
REFINING, LLC

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